

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO. 03-12551-MBB

FRANK SACO,
Plaintiff,

VS.

TUG TUCANA CORPORATION,
Defendant.

DEFENDANT, TUG TUCANA CORPORATION'S,
REQUEST FOR VOIR DIRE OF PROSPECTIVE JURORS

Now comes the defendant, TUG TUCANA CORPORATION, in the above captioned action, by its counsel, Clinton & Muzyka, P.C., and respectfully requests this Honorable Court to inquire of the prospective jurors on voir dire the following questions:

1. Are any jurors, their family members or close friends involved or associated in the commercial marine and/or tugboat industry?
2. Are any jurors, their family members or close friends involved or associated in the medical and/or health care industry?
3. Have any jurors, their family members or close friends been a party in any recent litigation, or are a party in a present litigation?

4. Have any jurors, their family members or close friends been injured in an accident of any kind?
5. Have any jurors, their family members or close friends made any claim for a work related injury?
6. Do any jurors, their family members or close friends testify in legal or administrative proceedings as expert witnesses?
7. Do any of the jurors have a physical impairment(s) (hearing, vision or other) that would prevent or affect his or her ability to receive the evidence?
8. Do any of the jurors have preconceived determinations regarding the parties or any issue in this personal injury claim?

By its attorneys,

CLINTON & MUZYKA, P.C.

"/s/Thomas J. Muzyka"

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